

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

MICHAEL BUSH,  
*Plaintiff,*

VS.

ACTON-BOXBOROUGH REGIONAL SCHOOL  
DISTRICT, PETER LIGHT, DAWN GRIFFIN  
BENTLEY and ERIN O'BRIEN BETTEZ,  
*Defendants.*

C.A. NO. 1:21-cv-12039-IT

## **DEFENDANTS' MOTION TO STAY DISCOVERY**

Defendants, Acton-Boxborough Regional School District, Superintendent Peter Light, former Assistant Superintendent Dr. Dawn Bentley, and Director of Community Education Erin Bettez, hereby move to stay all discovery in this matter pending the outcome of defendants' Motion to Dismiss Plaintiff's First Amended Complaint. (ECF Doc. No. 43). As grounds therefor, defendants state that good cause exists to temporarily stay discovery in this matter until after this Court has ruled on whether plaintiff's *pro se* First Amended Complaint states claims against defendants upon which relief can be granted. This Court may grant such relief under its inherent powers to stay proceedings for prudential reasons and its authority to issue protective orders under Fed. R. Civ. P. 26(c)(1). Steward Health Care System LLC v. Southcoast Health System, Inc., 2016 WL 11004353, at \*2 (D. Mass. June 15, 2016); Channing Bete Co., Inc. v. Greenberg, 2021 WL 4398510, at \*2 (D. Mass. Sept. 27, 2021). Defendants submit the enclosed Memorandum of Law and Exhibits "A" – "C" attached hereto in support of this Motion.

WHEREFORE, for good cause shown, this Court should stay all discovery in this matter pending the outcome of defendants' Motion to Dismiss Plaintiff's First Amended Complaint.

Respectfully submitted,

The Defendants,

ACTON-BOXBOROUGH REGIONAL SCHOOL  
DISTRICT, SUPERINTENDENT PETER LIGHT,  
DR. DAWN BENTLEY and ERIN BETTEZ,

By their Attorneys,

**PIERCE DAVIS & PERRITANO LLP**

*/s/ John J. Davis*

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Dated: December 28, 2022

**CERTIFICATION PURSUANT TO LOCAL RULE 7.1**

Undersigned counsel for the defendants hereby certifies, pursuant to Local Rule 7.1(a)(2), that on December 28, 2022, counsel conferred with *pro se* plaintiff, Michael Bush, by telephone, and attempted in good faith to resolve or narrow the issues regarding defendants' Motion to Stay Discovery.

*/s/ John J. Davis*

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John J. Davis, Esq.

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing, filed through the Electronic Case Filing System, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and that a paper copy shall be served upon those indicated as non-registered participants on December 28, 2022.

*/s/ John J. Davis*

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John J. Davis, Esq.